

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Lead Plaintiff and Class

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, and
BELINDA NUCIFORA,

Defendants.

CASE No.: 1:24-cv-07046-PK

**NOTICE OF MOTION OF MING LI
TO: (1) APPOINT LEAD PLAINTIFF;
AND (2) APPROVE LEAD
PLAINTIFF'S SELECTION OF
COUNSEL**

CLASS ACTION

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiff Ming Li ("Movant") hereby moves this Court, the Honorable Peggy Kuo, United States Magistrate Judge, on a date and at a time to be designated by the Court, for an order:

- (a) appointing Movant to serve as Lead Plaintiff in this action; and
- (b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel for the Class.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated December 6, 2024 (and exhibits); and (ii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

Movant is aware of Your Honor's Individual Rule VI.A.2.a which generally requires a pre-motion conference prior to filing many motions. Due to the PSLRA's lead plaintiff procedure, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. As such, Movant respectfully requests that the pre-motion conference requirement be waived. The filing of the lead plaintiff motion will give notice to the other lead plaintiff movants, whose identities Movant cannot know at this time and therefore cannot serve, that other class members have moved for lead plaintiff appointment.

Dated: December 6, 2024

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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*[Proposed] Lead Counsel for Lead Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim